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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

STATE OF NEVADA

RUBEN CESAR ESPINOZA, an individual;

Plaintiff,

v.

GEICO ADVANTAGE INSURANCE
COMPANY, a Foreign Corporation; DOES I-
X; and DOE EMPLOYEES XI-XX; and ROE
BUSINESS ENTITIES XXI-XXX,

Defendants.

CASE NO.: 2:23-cv-02079-ART-DJA

**STIPULATION AND ORDER TO
EXTEND DATE OF PLAINTIFF'S
RESPONSE TO DEFENDANT'S
MOTION TO DISMISS**

[FIRST REQUEST]

The parties, by and through their respective counsel hereby confirm that the parties are scheduled to enter into a Mediation on January 16, 2024. Therefore, the parties respectfully request additional time to have Plaintiff file his response to Defendant's Motion to Dismiss.

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The parties, by and through their respective counsel, stipulate to the following:

1. Plaintiff will file his Opposition to Defendant's Motion to Dismiss by Wednesday, **January 31, 2024.**

DATED this 12th of January, 2024.
GINA CORENA & ASSOCIATES

DATED this 12th of January, 2024.
**McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP**

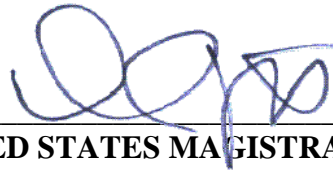
/s/ Mahna Pourshaban
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Attorneys for Plaintiff

/s/ Jonathan W. Carlson
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Las Vegas, Nevada 89113
Attorney for Defendant

CASE NO.: 2:23-cv-02079-ART-DJA
STIPULATION AND ORDER TO EXTEND DATE OF PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
[FIRST REQUEST]

IT IS SO ORDERED:

Plaintiff will file his Opposition to Defendant's Motion to Dismiss by Wednesday,
January 31, 2024.



UNITED STATES MAGISTRATE JUDGE

DATED: 1/16/2024

From: [Jonathan Carlson](#)
To: [Eva Rodriguez Dhimi](#)
Cc: [Mahna Pourshaban](#); [Debbie DeArmond](#); [Edith Montano](#); [Cheryl Schneider](#)
Subject: RE: Espinosa v GEICO
Date: Friday, January 12, 2024 1:10:07 PM

Okay to e-sign for us, thanks.

From: Eva Rodriguez Dhimi <eva@lawofficecorena.com>
Sent: Friday, January 12, 2024 8:36 AM
To: Jonathan Carlson <Jonathan.Carlson@mccormickbarstow.com>
Cc: Mahna Pourshaban <Mahna@lawofficecorena.com>; Debbie DeArmond <Debbie.DeArmond@mccormickbarstow.com>; Edith Montano <edith@lawofficecorena.com>
Subject: RE: Espinosa v GEICO
Importance: High

Good morning,

Please see the updated SAO to meet the court's request.

From: Jonathan Carlson <Jonathan.Carlson@mccormickbarstow.com>
Sent: Tuesday, January 9, 2024 2:54 PM
To: Eva Rodriguez Dhimi <eva@lawofficecorena.com>
Cc: Mahna Pourshaban <Mahna@lawofficecorena.com>; Debbie DeArmond <Debbie.DeArmond@mccormickbarstow.com>; Edith Montano <edith@lawofficecorena.com>
Subject: Re: Espinosa v GEICO

Okay to esign for us, thanks!

Sent from my iPhone

On Jan 9, 2024, at 1:42 PM, Eva Rodriguez Dhimi <eva@lawofficecorena.com> wrote:

Good afternoon,

I am following up on our email as the deadline is today to be able to submit to the Court today.

From: Eva Rodriguez Dhimi
Sent: Tuesday, January 9, 2024 11:35 AM
To: 'Jonathan Carlson' <Jonathan.Carlson@mccormickbarstow.com>; Mahna Pourshaban <Mahna@lawofficecorena.com>; Debbie DeArmond <Debbie.DeArmond@mccormickbarstow.com>
Cc: Edith Montano <edith@lawofficecorena.com>